

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
CEDAR RAPIDS DIVISION**

PARENTS DEFENDING
EDUCATION,

Plaintiff,

v.

LINN-MAR COMMUNITY SCHOOL
DISTRICT; SHANNON BISGARD, in
his official capacity as Superintendent of
Linn-Mar Community School District;
BRITTANIA MOREY, CLARK
WEAVER, BARRY BUCHHOLZ,
SONDRA NELSON, MATT
ROLLINGER, MELISSA WALKER,
and RACHEL WALL, in their official
capacities as members of the Linn Marr
Community School District School
Board,

Defendants.

Case No. _____

DECLARATION OF PARENT D

1. I live within the boundaries of the Linn-Mar Community School District (“Linn-Mar”) and am the parent of a school-aged child.

2. I am over the age of eighteen and under no mental disability or impairment. I have personal knowledge of the following facts and, if called as a witness, would competently testify to them.

3. I am a member of Parents Defending Education.

4. My son is enrolled in Linn-Mar High School.

5. I have raised my son to believe that people are either male or female, and that biological sex is immutable and does not change based on someone's internal feelings. I have taught my son to be respectful to others but also to tell the truth and always stand up for his beliefs, even when those beliefs are unpopular.

6. My son believes that people are either male or female and that a person cannot "transition" from one sex to another. He has no ill-will towards members of the LGBT community, but he does not want to be forced to affirm that a biologically female classmate is actually a male, or vice versa.

7. Due to the speech policy, however, my son either remains silent in school environments or avoids using sex-specific pronouns altogether. Still, I know that it is only a matter of time until he will be forced to confront the issue directly.

8. I want my son to be educated in a challenging environment that involves the free exchange of ideas, and to be free to express his beliefs, even if others disagree with those beliefs or find them offensive.

9. Under the Speech Policy, however, my child can be punished merely for expressing an opinion about the nature of biological sex, declining to use another student's "preferred pronouns," or disagreeing with another student's assertion about whether they are male or female.

10. I am concerned that my son will be subjected to formal discipline that will harm his college admission chances and his extracurricular opportunities, unless he affirms ideas that are inconsistent with his deeply held beliefs.

11. I am signing this declaration under a pseudonym because I live in Linn-Mar and, if my participation in this litigation becomes public, I fear reprisal from school officials, my child's teachers and fellow students, and members of the broader community.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing
is true and correct to the best of my knowledge.

Executed this 19th day of July, 2022

Parent D
Parent D